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Joseph J. Mulieri
Director
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EX PARTE OR LATE FILED

May 12, 1998

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Rm. 222
Washington, D.C. 20554

RECEIVED

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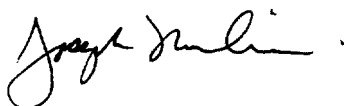
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**Re: CC Docket No. 97-250**

Dear Ms. Salas:

Today, on behalf of Bell Atlantic, Joe DiBella, Bob McDonnell, and I met with Paul D'Ari, David Hunt, Paula Cech, Richard Kiatkowski, and Joel Taubenblatt of the Competitive Pricing Division regarding the above captioned proceeding. The meeting focused on positions contained in Bell Atlantic's Direct Case submitted in this proceeding. During the meeting the attached material was discussed.

Please enter this letter and attached material into the record as appropriate. Should you have any questions please do not hesitate to contact me.

Sincerely,



Attachment

cc: P. D'Ari
P. Cech
D. Hunt
R. Kiatkowski
J. Taubenblatt

BELL ATLANTIC'S DEFINITION OF NON-PRIMARY LINES

Presentation to the FCC

May 12, 1998

BELL ATLANTIC'S DEFINITION OF PRIMARY LINE

- The only line provided to a residential customer (billing name) at that location
- The line designated as primary by the billing name customer at the point of ordering service; or
- The first line installed by Bell Atlantic or a reseller

ADVANTAGES OF BELL ATLANTIC'S DEFINITION

- Clear and precise
- Avoids inconsistent treatment among customers
- Allows use of existing records
- Avoids intrusive information gathering
- Captures non-primary lines which are billed on separate accounts but which are in the same billing name

ADVANTAGES OF BELL ATLANTIC'S DEFINITION OVER LOCATION DEFINITION

- Non-intrusive regarding service to multiple accounts at a location - considers alternative living arrangements
- Avoids penalizing individuals who could be inappropriately classified as non-primary line customers
- Minimizes customer confusion, inquiries and complaints

**BELL ATLANTIC'S DEFINITION PRODUCES RESULTS
WHICH ARE MORE REASONABLE THAN OTHER ACCOUNT-
BASED DEFINITIONS**

<u>COMPANY</u>	<u>RATIO*</u>
BELL ATLANTIC SOUTH	10.14%
BELL ATLANTIC NORTH	7.69%
BELL ATLANTIC (TOTAL)	9.04%
SPRINT LTCS	9.54%
SWBT	8.87%
BELLSOUTH	8.70%
NEVADA BELL	7.47%
SNET	6.31%
CINCINNATI BELL	5.79%
GTE	5.01%
FRONTIER	4.77%
ALLIANT	4.38%
PACIFIC BELL	3.34%
CITIZENS	2.62%
AVERAGE	7.65%

*Non-Primary Residential and BRI ISDN to All Residential and Single Line
Business

**BELL ATLANTIC'S DEFINITION INCLUDES
NON-PRIMARY LINES WHICH ARE ON
SEPARATELY BILLED ACCOUNTS**

<u>COMPANY</u>	<u>INCLUDES SEP.BILLED</u>	<u>RATIO</u>
BELL ATLANTIC (Total)	YES	9.04%
SWBT	NO	8.87%
NEVADA BELL	NO	7.47%
CINCINNATI BELL	NO	5.79%
PACIFIC BELL	NO	3.34%